

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

15-CR-149-A

FRANK R. PARLATO, JR. and  
CHITRA SELVARAJ,

Defendants.

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**GOVERNMENT'S MOTION TO  
PARTIALLY SEAL SUPPLEMENTAL REPLY BRIEF**

The government moves to partially seal its supplemental reply brief filed in support of the government's motion to exclude inadmissible hearsay. *See* Dkt. 194. To show why certain hearsay testimony is inadmissible under Federal Rule of Evidence 807, the government's supplemental reply brief must quote from, and summarize, a witness's grand jury testimony.

Federal Rule of Criminal Procedure 6(e)(6) requires that "[r]ecords . . . related to grand-jury proceedings . . . be kept under seal to the extent and as long as necessary to prevent the unauthorized disclosure of a matter occurring before a grand jury." The government therefore moves to seal those parts of its supplemental reply brief that quote or summarize the witness's grand jury testimony and which therefore disclose a "matter occurring before a grand jury." The government will publicly file a redacted copy of its brief and will file an unredacted copy of its brief under seal.

DATED: Buffalo, New York, July 14, 2022.

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